

*Database
Service
Management
Inc.*

April 6, 2010

Ann Stevens
Wireline Competition Bureau
445 12th St., SW
Washington, DC 20554

Re: Toll Free Number Exhaust

Dear Ms. Stevens:

On our call on Thursday, March 25, 2010, you requested a letter from DSMI outlining our options for dealing with the pending exhaust of the Toll Free number resource. We currently have planning initiatives underway for two projects.

We expect, by early July of this year, to have a capability in place to allow for a table driven number reservation allocation system. The system will be based on a table that contains an entry for each and every Responsible Organization (Resp Org), at the "Entity" level, which indicates the maximum allowable quantity of Toll Free numbers the various sub-Resp Orgs associated with that Entity can reserve in any given calendar week. The entries can be based on whatever mechanism you specify when requesting that we implement such an allocation system, assuming of course that either you make the entry calculations or that we have sufficient data to make the calculations ourselves. For example, the entries could be:

- a) A uniform amount per Entity;
- b) An amount based on the market size of the Entity, presumably driven by the quantity of "Working" numbers within the system as of a specified date;
- c) Some combination allocating every Entity a base quantity, with an additional quantity assigned based on market size / share; or
- d) Another mechanism as defined by you and the Commission staff.

Once an Entity has exceeded its allowed limit for a given week, that Resp Org, as well as all of its sub-Resp Orgs, would be blocked from making any additional Toll Free reservations until the start of the next week. We are not currently contemplating any "carry over" of allowed reservations from week to week, nor any credits for "returned" numbers. "Returned" numbers are numbers which were previously reserved but were returned to the pool of available numbers during the weekly cycle.

Please let me remind you that when the Commission last ordered such an allocation system to be put in place, prior to the opening of the 888 code, you also required a ban on new Resp Org Entities. The purpose of the ban was to block new entrants from consuming numbers from the limited resource of available numbers, as well as to block existing Entities from forming new Resp Orgs simply to increase their access to the allocation pool. You may want to consider such an option along with considering the benefits / consequences of implementing an allocation system as discussed above.

Our hope is that making this allocation option available to you will allow you more flexibility in terms of the timing of the opening of the 855 code.

In terms of our second project, we continue to expect the SMS/800 system itself to be ready to support the assignment and provisioning of 855 Toll Free numbers by October 1, 2010, but do see value in allowing the Industry additional time to prepare their own systems and networks.

To help expedite the Industry efforts, we are defining plans that will allow the Mechanized Generic Interface (MGI) users, and any other user who may want to take advantage of the opportunity, to begin testing with our Test / Disaster Recovery system in the SMS/800 Data Center in Salt Lake City, Utah. We are working with the SMS/800 Help Desk to complete the assignment of 855-250 test numbers to all Resp Orgs and Service Control Point (SCP) Owners / Operators. In addition, we are working with the SCP Owners / Operators to open their databases to the downloading of a limited number of 855 test records to support the start of network testing as quickly as possible.

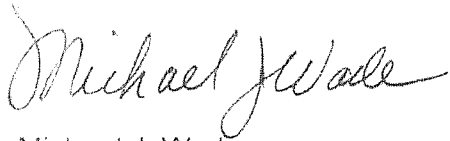
Hopefully these efforts will allow at least some of the activities associated with the opening of the 855 code to proceed in parallel as opposed to having to occur sequentially.

Lastly, let me provide an update to some of the information we discussed on the call last Thursday. Attached to this letter is a copy of the most recent Number Administration Summary Report, dated Monday, March 29, 2010. It provides data on the usage of Toll Free numbers as of Saturday, March 27, 2010. As you will see at the bottom of the second page, the use of Toll Free numbers is currently growing at the rate of 97,303 per week, averaged over the most recent six (6) weeks. At that rate, we will exhaust the current supply of Toll Free numbers in late January 2011.

If there is additional information we can provide, or additional activities you would like us to initiate, please let us know.

As always, we sincerely appreciate your efforts and support in addressing this matter.
Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Wade". The signature is fluid and elegant, with the first letters of the first and last names being capitalized and prominent.

Michael J. Wade
President - DSMI

Copy to: Marilyn Jones - FCC
Pamela Arluk - FCC
Eugene Gold - FCC
Michelle Sclater - FCC
SMS/800, Inc.
SNAC

SMIS/800®

Client: Golden Telecom

Bulletin Number: NUM-10-13
Date: 29-Mar-10
Subject: Number Administration Summary Reports for Saturday, 3/27/2010 as of 11:59 PM, Eastern Time

	STATUS										
	WORKING	ASSIGNED	RESERVED	DISCONNECT	TRANSIT	UNAVAIL	SUSPEND	TOTAL NUMBERS IN USE	PERCENT IN USE	SPARE	TOTAL POOL (In Use + Spare)
NPA: 800	7,771,824	1,521	7,388	30,802	47,273	11,243	5	7,870,056	100.00%	0	7,870,056
NPA: 866	7,758,447	10,386	11,428	57,463	54,913	1,500	7	7,894,144	98.92%	85,856	7,980,000
NPA: 877	5,398,377	3,623	56,457	48,161	50,162	1,500	10	5,558,290	69.65%	2,421,710	7,980,000
NPA: 888	5,984,221	933	67,678	38,843	66,787	3,109	11	6,161,582	77.21%	1,818,418	7,980,000
TOTAL:	26,912,869	16,463	142,951	175,269	219,135	17,352	33	27,484,072	86.40%	4,325,984	31,810,056

CLOSED 800-NXX'S: ALL OXX AND 1XX CODES (000-199)
 271; 389; 415; 534; 623; 703; 740; 744; 751; 855; 904; 907; 911

CLOSED 866-NXX'S: ALL OXX AND 1XX CODES (000-199)
 555; 911

CLOSED 877-NXX'S: ALL OXX AND 1XX CODES (000-199)
 555; 911

CLOSED 888-NXX'S: ALL OXX AND 1XX CODES (000-199)
 555; 911

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WEEK ENDING DATE	TOTAL NUMBERS IN USE	SPARE	GROWTH/WEEK	NUMBERS RESERVED DURING WEEK	NUMBERS SPARED FROM DISCONNECT	NUMBERS SPARED FROM RESERVED	NUMBERS SPARED FROM UNAVAILABLE	TOTAL SPARED DURING WEEK
2/20/2010	26,999,505	4,810,495	99,306	122,571	15,224	8,307	0	23,531
2/27/2010	27,072,622	4,737,378	73,117	142,569	41,185	28,267	0	69,452
3/6/2010	27,132,287	4,677,713	59,665	97,468	30,304	7,499	0	37,803
3/13/2010	27,270,689	4,539,311	138,402	171,747	18,911	14,434	0	33,345
3/20/2010	27,371,265	4,438,791	100,520	154,032	40,906	12,550	0	53,456
3/27/2010	27,484,072	4,325,984	112,807	135,970	15,617	7,546	0	23,163

A statistical analysis performed in February 2010, relying on data from August 1997 to January 31, 2010, indicates the current pool of Toll Free numbers will exhaust in second quarter 2014. The forecast also indicates that the 90% threshold of the current pool, or 28,629,000 Toll Free numbers in use, will be reached in fourth quarter 2011. Toll Free number utilization will continue to be monitored and the forecast will be updated as required.

Toll Free number growth has risen significantly since the statistical forecast was conducted. If usage continues at the same level as the average growth rate for the last six (6) weeks, the estimated exhaust date for the current Toll Free number pool is as follows:

(A) Total Spare Numbers (03/27/10)	4,325,984
(B) Average Growth/Week	97,303
(C) A/B =	44 Weeks (estimated exhaust date of 01/29/11)